

**JULES COHEN & ASSOCIATES, P.C.**  
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**Bernard R. Segal, P.E.**  
*President*

**Alan E. Gearing, P.E.**  
*Vice President-Secretary*

**Robert W. Denny, Jr., P.E.**  
*Vice President-Treasurer*

**Jules Cohen, P.E.**  
**William C. King, Jr., P.E.**  
*Consultants to the Firm*

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FEB - 6 1991

**Charles N. Miller, P.E.**  
**Alan R. Rosner**

February 6, 1991

Federal Communications Commission  
Office of the Secretary

**HAND DELIVERED**

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
Washington, DC 20554

Dear Madam Secretary:

In conformance with the provisions of Section 1.405 of the Rules, I submit herewith an "Original" and five copies of the statement of Jules Cohen & Associates, P.C., in support of the Petition for Inquiry in RM-7594 by the firms of duTreil, Lundin & Rackley, Inc.; Hatfield & Dawson Consulting Engineers, Inc.; Lahm, Suffa and Cavell, Inc.; Moffet, Larson & Johnson, Inc.; and Silliman and Silliman.

I certify that a copy of the statement has been mailed on this date to each of the above-named firms at the following addresses:

du Treil, Lundin & Rackley, Inc.  
1019 - 19th Street, NW, Suite 300  
Washington, DC 20036

Hatfield & Dawson Consulting Engineers, Inc.  
4226 Sixth Avenue, NW  
Seattle, WA 98107

Lahm, Suffa and Cavell, Inc.  
3975 University Drive, Suite 450  
Fairfax, VA 22030

Ms. Donna R. Searcy

February 6, 1991

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Federal Communications Commission  
Office of the Secretary

Moffet, Larson & Johnson, Inc.  
Two Skyline Place  
5203 Leesburg Pike, Suite 800  
Falls Church, VA 22041

Silliman and Silliman  
8121 Georgia Avenue, Suite 700  
Silver Spring, MD 20910-4933

Sincerely yours,



Bernard R. Segal, P.E.

Enclosures

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**FEB - 6 1991**

**STATEMENT OF JULES COHEN & ASSOCIATES, P.C.**  
**IN THE MATTER OF AN INQUIRY INTO** Federal Communications Commission  
**THE COMMISSION'S POLICIES AND RULES REGARDING** Office of the Secretary  
**AM DIRECTIONAL ANTENNA PERFORMANCE VERIFICATION**  
**RM-7594**

Jules Cohen & Associates, P.C. and its predecessor firm, Jules Cohen & Associates, have provided consulting engineering services to the broadcasting industry for more than 30 years. Several other firms (hereafter "Joint Petitioners") have requested that the FCC open a general inquiry into the Commission's policies and rules pertaining to the performance verification of AM directional antenna systems. RM-7594 has been assigned to the petition.

An inquiry along the lines sought by the Joint Petitioners would be appropriate now considering the FCC's on-going proceeding in MM Docket Number 87-267 looking toward the adoption of new technical assignment criteria for the AM broadcast service. Rarely do opportunities occur for the promulgation of comprehensive new rules without disruptive freezes. However, since a freeze is already in effect on the acceptance of applications for new and major-change proposals for AM facilities pending the outcome of MM Docket Number 87-267, a review of the rules regarding AM directional antenna performance verification, at this time, could dovetail with the timing for the MM Docket Number 87-267 proceeding without the need for extending the current freeze or requiring a new freeze.

At the conclusion of the MM Docket Number 87-267 proceeding and the lifting of the current freeze on the acceptance of applications for new and major-change proposals for AM facilities, it may be expected that many new proposals involving directional antennas will be submitted to the FCC. In the normal course of events, the first wave of applications will not be issued construction permits for four to six months from the initial dates of filing. The need for antenna system performance verification following construction generally will not occur for anywhere from six months to a year thereafter. The time span, taking into account the

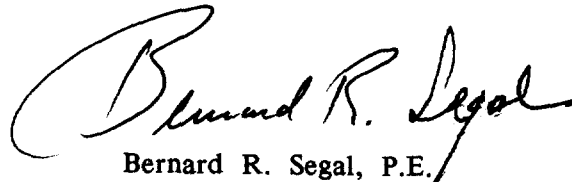
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WASHINGTON, D.C. 20036

Statement of Jules Cohen & Associates, P.C.  
RM-7594

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unspecified time yet needed to complete consideration of the rules proposed for adoption in MM Docket Number 87-267, should be adequate to permit adoption of any new rules deemed desirable following the Notice of Inquiry and Notice of Proposed Rule Making administrative procedures for the instant proceeding without the need for an additional disruptive freeze.

We believe the Joint Petitioners request is meritorious, and an inquiry looking toward a review of the FCC's directional antenna performance verification procedures should be instituted without delay.



Bernard R. Segal, P.E.  
President

January 29, 1991